

John E. Flaherty  
Ravin R. Patel  
Guillermo C. Artiles  
McCARTER & ENGLISH LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102  
(973) 622-4444

*Counsel for Defendant Duo Security Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

STRIKEFORCE TECHNOLOGIES, INC.,

Plaintiff,

v.

DUO SECURITY INCORPORATED, CENTRIFY  
CORPORATION, and TRUSTWAVE HOLDINGS,  
INC,

Defendants.

No. 2:16-cv-3571-JMV-MF

Hon. John Michael Vazquez

LEAD CASE

**SUPPLEMENTAL DECLARATION OF DARREN M. FRANKLIN  
IN SUPPORT OF DEFENDANTS' JOINT MOTION TO STAY  
PENDING COMPLETION OF *INTER PARTES* REVIEW PROCEEDINGS**

I, Darren M. Franklin, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Sheppard, Mullin, Richter & Hampton LLP, attorneys of record for Defendant Centrifify Corporation.
2. If called as a witness, I could and would competently testify to all facts within my personal knowledge except where stated upon information and belief.
3. This supplemental declaration is submitted in support of Defendants' Joint Motion to Stay Pending Completion of *Inter Partes* Review Proceedings.
4. Attached as **Exhibit 1** is the Form 10-K of StrikeForce Technologies, Inc. ("StrikeForce") submitted to the United States Securities Exchange Commission ("SEC"), for the year ending December 31, 2008, downloaded from the SEC's website.

5. Attached as **Exhibit 2** is StrikeForce's Form 10-K submitted to the SEC, for the year ending December 31, 2009, downloaded from the SEC's website.

6. Attached as **Exhibit 3** is StrikeForce's Form 10-K submitted to the SEC, for the year ending December 31, 2010 10-K, downloaded from the SEC's website.

7. Attached as **Exhibit 4** is StrikeForce's Form 10-K submitted to the SEC, for the year ending December 31, 2011 10-K, downloaded from the SEC's website.

8. Attached as **Exhibit 5** is StrikeForce's Form 10-K submitted to the SEC, for the year ending December 31, 2012 10-K, downloaded from the SEC's website.

9. Attached as **Exhibit 6** is StrikeForce's Form 10-K submitted to the SEC, for the year ending December 31, 2013 10-K, downloaded from the SEC's website.

10. Attached as **Exhibit 7** is StrikeForce's Form 10-K submitted to the SEC, for the year ending December 31, 2014 10-K, downloaded from the SEC's website.

11. Attached as **Exhibit 8** is StrikeForce's Form 10-K submitted to the SEC, for the year ending December 31, 2015 10-K, downloaded from the SEC's website.

12. Attached as **Exhibit 9** is StrikeForce's Form 10-K submitted to the SEC, for the year ending December 31, 2016 10-K, downloaded from the SEC's website.

13. Attached as **Exhibit 10** is a true and correct copy of the "Magic Quadrant for User Authentication" report published by Gartner, Inc, dated December 1, 2014.

14. Attached as **Exhibit 11** is a true and correct copy of another blog post published by Microsoft, titled "Windows Azure Active Authentication: Multi-Factor for Security and Compliance," which can be found at the following URL:

<https://blogs.technet.com/b/ad/archive/2013/06/12/windows-azure-active-authentication-multi-factor-for-security-and-compliance/>. This blog post was also attached as Exhibit D to the

Declaration of Mary Jane Peal (D.I. 139), filed by PhoneFactor, Inc. in the Delaware litigation, *StrikeForce Technologies, Inc. v. PhoneFactor, Inc. et. al.*, No. 13-cv-490-RGA-MPT, D. Del, in support of its Opposition to StrikeForce's Motion for Leave to Join Microsoft Corporation to Amend its Complaint to Assert Claims Against Microsoft.

15. Attached as **Exhibit 12** is a true and correct copy of Microsoft's webpage for Microsoft Azure, titled "Multi-Factor Authentication," which can be found at the following URL: <https://azure.microsoft.com/en-us/services/multi-factor-authentication/>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 12th day of June, 2017, at Los Angeles, California.

A handwritten signature in blue ink that reads "Darren Franklin". The signature is written in a cursive, flowing style.

---

Darren M. Franklin